

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--|----------|---|
| UNITED STATES OF AMERICA | : | DATE FILED: <u>July 24, 2008</u> |
| v. | : | CRIMINAL NUMBER: <u>08-</u> |
| TIERENEY BROWN, | : | VIOLATIONS: |
| a/k/a "Tiereney Michelle Moon," | : | 18 U.S.C. § 1344 (bank fraud - 3 |
| a/k/a "Tiereney M. Brown," | : | counts) |
| a/k/a "Tiereney Moon Brown," | : | 18 U.S.C. § 1014 (false statement to |
| a/k/a "Tiereney Moon-Browne," | : | a financial institution - 3 counts) |
| a/k/a "Tiereney M. Browne- | : | 42 U.S.C. § 408(a)(7)(B) (using a |
| Moon," | : | social security number with intent |
| a/k/a "Tierney Brown," | : | to defraud - 7 counts) |
| a/k/a "Tiaranay M. Brown" | : | 18 U.S.C. § 1028A (aggravated |
| | : | identity theft - 3 counts) |
| | : | Notice of forfeiture |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this Indictment, Harleysville National Bank, Harleysville, Pennsylvania ("HNB") was a financial institution whose accounts were insured by the Federal Deposit Insurance Corporation, certificate number 7516.

2. From in or about July, 2007 through in or about January, 2008, in the Eastern District of Pennsylvania, defendant

**TIERENEY BROWN
a/k/a/ "Tiereney Michelle Moon"
a/k/a/ "Tiereney M. Brown"
a/k/a "Tiereney Moon Brown"
a/k/a/ "Tiereney Moon-Browne"
a/k/a/ "Tiereney M. Browne-Moon"
a/k/a/ "Tierney Brown"
a/k/a/ "Tiaranay M. Brown"**

knowingly executed and attempted to execute a scheme to defraud HNB and to obtain monies owned by and under the care, custody and control of that bank by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

3. On or about August 6, 2007, defendant TIERENEY BROWN opened an account at HNB. Defendant Brown opened this account using the name “Tiereney M. Browne-Moon,” an inaccurate date of birth of 08/16/70, and a social security number assigned to another person, identified here as “LAG,” as her own.

4. On or about the following dates, the defendant TIERENEY BROWN deposited and attempted to deposit the following checks into HNB account 1000382786:

| <u>DATE</u> | <u>BANK DRAWN ON</u> | <u>ACCOUNT HOLDER</u> | <u>AMOUNT</u> |
|-------------|--|-----------------------|---------------|
| 12/14/07 | Philadelphia Federal Credit Union (“PFCU”) | Tiereney M. Brown | \$875.00 |
| 12/20/07 | PFCU | Tiereney M. Brown | \$325.00 |
| 12/20/07 | PFCU | Tiereney M. Brown | \$1,000.00 |
| 12/24/07 | PFCU | Tiereney M. Brown | \$180.00 |
| 12/27/07 | PFCU | Tiereney M. Brown | \$1,900.00 |
| 12/31/07 | PFCU | Tiereney M. Brown | \$2,100.00 |
| 01/03/08 | Bank of America | Tiereney M. Browne | \$2,700.00 |

5. The PFCU checks deposited by defendant TIERENEY BROWN were drawn on accounts previously opened by defendant BROWN using false information. The account at PFCU became overdrawn and had been closed by PFCU in or about June, 2006.

6. The Bank of America check deposited by defendant TIERENEY BROWN

was drawn on an account which had been closed by Bank of America in or about October 2006.

7. All of the checks listed above were rejected by PFCU and Bank of America. Before HNB learned that the deposited checks had been dishonored, defendant TIERENEY BROWN withdrew funds from the HNB account.

8. As a result, defendant TIERENEY BROWN caused a loss of approximately \$1,638.14 to HNB.

In violation of Title 18, United States Code, Sections 1344 and 1349.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this Indictment, American Heritage Federal Credit Union, Philadelphia, Pennsylvania (“American Heritage”) was a federal credit union whose accounts were insured by the National Credit Union Share Insurance Fund, certificate number 5621.

2. From on or about January 25, 2008, through in or about April, 2008, in the Eastern District of Pennsylvania, defendant

TIERENEY BROWN
a/k/a/ “Tiereney Michelle Moon”
a/k/a/ “Tiereney M. Brown”
a/k/a “Tiereney Moon Brown”
a/k/a/ “Tiereney Moon-Browne”
a/k/a/ “Tiereney M. Browne-Moon”
a/k/a/ “Tierney Brown”
a/k/a/ “Tiaranay M. Brown”

knowingly executed and attempted to execute a scheme to defraud American Heritage and to obtain monies owned by and under the care, custody and control of that financial institution by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

3. On or about January 23, 2008, defendant TIERENEY BROWN, using her own Pennsylvania driver/operator’s license for identification, completed an application and opened a bank account at American Heritage. The account was assigned number 897029690.

4. On or about April 9, 2008, the defendant TIERENEY BROWN deposited a Bank of America check in the amount of \$4,100.00, which was drawn on the same Bank of America account identified in Count One of this Indictment, and which account had been closed

by Bank of America in or about October 2006.

In violation of Title 18, United States Code, Sections 1344 and 1349.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this Indictment, the Police and Fire Federal Credit Union, Philadelphia, Pennsylvania, ("PFFCU") was a federal credit union whose accounts were insured by the National Credit Union Share Insurance Fund, certificate number 2551.

2. From in or about November, 2007 through in or about May, 2008, in the Eastern District of Pennsylvania, defendant

TIERENEY BROWN
a/k/a/ "Tierenity Michelle Moon"
a/k/a/ "Tierenity M. Brown"
a/k/a "Tierenity Moon Brown"
a/k/a/ "Tierenity Moon-Browne"
a/k/a/ "Tierenity M. Browne-Moon"
a/k/a/ "Tierney Brown"
a/k/a/ "Tiaranay M. Brown"

knowingly executed and attempted to execute a scheme to defraud PFFCU and to obtain monies owned by and under the care, custody and control of that financial institution by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

Account Number 72180701

3. It was part of the scheme that on or about December 18, 2007, defendant TIERENEY BROWN opened an account at PFFCU. In the account opening application, defendant TIERENEY BROWN used the name "Tierenity Moon-Browne," used the social security number of another person, identified here as "LAG," as her own, and provided other false information. The account was assigned account number 72180701.

4. On or about the dates listed below, the defendant TIERENEY BROWN

deposited the following checks drawn on the account of “Tierney M. Browne-Moon” at Harleysville National Bank, account number 1000382786 (the same account described in Count One of this Indictment).

| DATE | BANK DRAWN ON | ACCOUNT HOLDER | AMOUNT |
|----------|----------------------------|------------------------|----------|
| 12/29/07 | Harleysville National Bank | Tierney M. Browne-Moon | \$800.00 |
| 01/01/08 | Harleysville National Bank | Tierney M. Browne-Moon | \$80.00 |

5. Harleysville National Bank refused payment on these checks. Before PFFCU learned that the deposited checks were dishonored, the defendant TIERENEY BROWN withdrew funds from this PFFCU account.

6. As a result, defendant TIERENEY BROWN caused a loss to PFFCU on account number 72180701 in the approximate amount of \$183.00.

Account number 72662401

7. It was further part of the scheme that on or about March 16, 2008, the defendant TIERENEY BROWN, using the name “Tierney M. Brown” opened another account at PFFCU. In the account opening application, the defendant TIERENEY BROWN used the name “Tierney M. Brown,” used the social security number of another person, identified here as “MBH,” as her own, and furnished other false information. The account was assigned account number 72662401.

8. On or about the dates listed below, the defendant TIERENEY BROWN deposited the following checks drawn on the account of a person identified here as “ABH” at Wachovia Bank, account number 1000041457844, which account was closed and, accordingly,

which checks were dishonored by Wachovia Bank.

| DATE | BANK DRAWN ON | ACCOUNT HOLDER | AMOUNT |
|----------|---------------|----------------|----------|
| 05/03/08 | Wachovia Bank | “ABH” | \$827.00 |
| 05/03/08 | Wachovia Bank | “ABH” | \$700.00 |
| 05/05/08 | Wachovia Bank | “ABH” | \$500.00 |
| 05/06/08 | Wachovia Bank | “ABH” | \$640.00 |

9. Before PFFCU Bank learned that the deposited checks were dishonored, the defendant TIERENEY BROWN withdrew funds from this PFFCU account.

10. As a result, the defendant TIERENEY BROWN caused a loss to PFFCU on account number 72662401 in the approximate amount of \$2576.00.

In violation of Title 18, United States Code, Sections 1344 and 1349.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this Indictment, Sovereign Bank, Reading, Pennsylvania, was a financial institution whose accounts were insured by the Federal Deposit Insurance Corporation, certificate number 29950.

2. On or about April 8, 2008, in the Eastern District of Pennsylvania, the defendant

TIERENEY BROWN
a/k/a/ "Tierney Michelle Moon"
a/k/a/ "Tierney M. Brown"
a/k/a "Tierney Moon Brown"
a/k/a/ "Tierney Moon-Browne"
a/k/a/ "Tierney M. Browne-Moon"
a/k/a/ "Tierney Brown"
a/k/a/ "Tiaranay M. Brown"

knowingly made and caused to be made to Sovereign Bank a false statement for the purpose of influencing the actions of Sovereign Bank upon a loan, that is, a loan in the amount of approximately \$38,303.50 for the purchase of a 2008 Mercedes Benz, in that defendant TIERENEY BROWN caused to be submitted to Sovereign Bank a loan application in furtherance of which the defendant submitted false information, including a social security number assigned to another person, identified here as "TAB," as her own, when, as the defendant knew, the information was false and the social security number used belonged to someone else.

In violation of Title 18, United States Code, Section 1014.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this Indictment, SB1 Federal Credit Union, Philadelphia, Pennsylvania ("SB1"), was a federal credit union whose accounts were insured by the National Credit Union Share Insurance Fund, certificate number 22637.

2. On or about April 17, 2008 and April 18, 2008, in the Eastern District of Pennsylvania, the defendant

TIERENEY BROWN
a/k/a/ "Tierney Michelle Moon"
a/k/a/ "Tierney M. Brown"
a/k/a "Tierney Moon Brown"
a/k/a/ "Tierney Moon-Browne"
a/k/a/ "Tierney M. Browne-Moon"
a/k/a/ "Tierney Brown"
a/k/a/ "Tiaranay M. Brown"

knowingly made and caused to be made to SB1 a false statement for the purpose of influencing the actions of SB1 upon a membership application and loan, that is, a loan application in the amount of approximately \$38,553.50, for the purchase of a 2008 Mercedes Benz, in that defendant TIERENEY BROWN caused to be submitted to SB1 a membership application and loan application in furtherance of which the defendant submitted false information, including a social security number assigned to another person, identified here as "TJB," as her own, when, as the defendant knew, the information was false and the social security number used belonged to someone else.

In violation of Title 18, United States Code, Section 1014.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this Indictment, Trumark Financial Credit Union, Trevose, Pennsylvania (“Trumark”) was a state-chartered credit union whose accounts are insured by the National Credit Union Share Insurance Fund, certificate number 66158.

2. On or about April 17, 2008 and April 18, 2008, in the Eastern District of Pennsylvania, defendant

TIERENEY BROWN
a/k/a/ “Tiereney Michelle Moon”
a/k/a/ “Tiereney M. Brown”
a/k/a “Tiereney Moon Brown”
a/k/a/ “Tiereney Moon-Browne”
a/k/a/ “Tiereney M. Browne-Moon”
a/k/a/ “Tierney Brown”
a/k/a/ “Tiaranay M. Brown”

knowingly made and caused to be made to Trumark a false statement for the purpose of influencing the actions of Trumark upon a membership application and loan, that is, a loan in the amount of approximately \$38,303.50 for the purchase of a 2008 Mercedes Benz, in that defendant TIERENEY BROWN caused to be submitted to Trumark a membership and loan application in furtherance of which the defendant submitted false information, including a social security number assigned to another person, identified here as “TJB,” as her own, when, as the defendant knew, the information was false and the social security number belonged to someone else.

In violation of Title 18, United States Code, Section 1014.

COUNTS SEVEN THROUGH THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about each of the dates listed below, each date constituting a separate count of this Indictment, in the Eastern District of Pennsylvania, defendant

TIERENEY BROWN
a/k/a/ “Tiereney Michelle Moon”
a/k/a/ “Tiereney M. Brown”
a/k/a “Tiereney Moon Brown”
a/k/a/ “Tiereney Moon-Browne”
a/k/a/ “Tiereney M. Browne-Moon”
a/k/a/ “Tierney Brown”
a/k/a/ “Tiaranay M. Brown”

with intent to deceive, and for the purpose of opening bank accounts and obtaining loans, falsely represented that the social security account number, ending in the last four digits listed below, had been assigned to her by the Commissioner of Social Security, when in fact such number was not the number assigned to her by the Commissioner of Social Security.

| <u>COUNT</u> | <u>DATE</u> | <u>BUSINESS TO WHOM REPRESENTATION WAS MADE</u> | <u>SOCIAL SECURITY NUMBER (LAST FOUR DIGITS)</u> | <u>PERSON TO WHOM SOCIAL SECURITY NUMBER WAS ASSIGNED</u> |
|---------------------|--------------------|--|---|--|
| 7 | 07/12/2007 | Harleysville National Bank | 9296 | “LAG” |
| 8 | 11/26/2007 | Police and Fire Federal Credit Union | 9296 | “LAG” |
| 9 | 03/21/2008 | Police and Fire Federal Credit Union | 9269 | “MBH” |
| 10 | 04/08/08 | Sovereign Bank | 5373 | “TAB” |
| 11 | 04/11/2008 | Mercedes Benz of Devon | 4137 | “TJB” |

| <u>COUNT</u> | <u>DATE</u> | <u>BUSINESS TO WHOM REPRESENTATION WAS MADE</u> | <u>SOCIAL SECURITY NUMBER (LAST FOUR DIGITS)</u> | <u>PERSON TO WHOM SOCIAL SECURITY NUMBER WAS ASSIGNED</u> |
|---------------------|--------------------|--|---|--|
| 12 | 04/17/08 | SB1 Federal Credit Union | 4137 | "TJB" |
| 13 | 04/17/08 | Trumark Financial Credit Union | 4137 | "TJB" |

In violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNTS FOURTEEN THROUGH SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about each of the dates listed below, each date constituting a separate count of this Indictment, in the Eastern District of Pennsylvania, defendant

TIERENEY BROWN
a/k/a/ “Tiereney Michelle Moon”
a/k/a/ “Tiereney M. Brown”
a/k/a “Tiereney Moon Brown”
a/k/a/ “Tiereney Moon-Browne”
a/k/a/ “Tiereney M. Browne-Moon”
a/k/a/ “Tierney Brown”
a/k/a/ “Tiaranay M. Brown”

knowingly and without lawful authority used a means of identification of another person, that is, a social security number, during and in relation to a loan fraud.

| <u>COUNT</u> | <u>DATE</u> | <u>FINANCIAL INSTITUTION</u> | <u>MEANS OF IDENTIFICATION (SOCIAL SECURITY NUMBER--LAST FOUR DIGITS)</u> | <u>PERSON TO WHOM SOCIAL SECURITY NUMBER WAS ASSIGNED</u> |
|---------------------|--------------------|-------------------------------------|--|--|
| 14 | 04/08/08 | Sovereign Bank | 5373 | “TAB” |
| 15 | 04/17/08 | SB1 Federal Credit Union | 4137 | “TJB” |
| 16 | 04/17/08 | Trumark Financial Credit Union | 4137 | “TJB” |

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1344, set forth in this indictment, defendant

TIERENEY BROWN
a/k/a/ "Tiereney Michelle Moon"
a/k/a/ "Tiereney M. Brown"
a/k/a/ "Tiereney Moon Brown"
a/k/a/ "Tiereney Moon-Browne"
a/k/a/ "Tiereney M. Browne-Moon"
a/k/a/ "Tierney Brown"
a/k/a/ "Tiaranay M. Brown"

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$ 3278.62.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON

LAURIE MAGID
ACTING UNITED STATES ATTORNEY